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October 17, 2022

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VIA ECF

The Honorable Colleen McMahon United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Maria del Carmen Valerio de Rodriguez, 22 Cr. 255 (CM)

Dear Judge McMahon:

On March 9, 2022, the Hon. Sarah Netburn appointed me to represent Maria de Rodriguez in connection with the above-captioned case. The parties are next scheduled to appear before this Court for a status conference on November 15, 2022.

I write respectfully to request a modification of Ms. de Rodriguez's bond conditions such that she be permitted to travel from her home to Philadelphia, Pennsylvania (and through all those jurisdictions in between as are required for her travel) on Saturday, October 29, 2022, and from Philadelphia back to her home on or before Sunday, October 30, 2022, in order to celebrate a friend's birthday. While in Philadelphia, Ms. de Rodriguez plans to stay with a friend at an address known to Pretrial Services and agrees to keep Pretrial fully informed of her travel plans and schedule for that weekend.

Pretrial Services, through United States Pretrial Services Officer Assistant Evelyn Alvayero, informed me it has no objection to this request. The government, through AUSA Kaylan Lasky, informed me that it defers its position on this request to Pretrial Services. Accordingly, I respectfully request that the Court modify Ms. de Rodriguez's bond such that she be permitted to travel from her home to Philadelphia on October 29, 2022 and return by October 30, 2022.

Thank you for the Court's consideration.

Respectfully submitted,

/s

Aaron Mysliwiec
Attorney for Maria del Carmen Valerio de Rodriguez

CC: Counsel of record via ECF